



OUTDOOR RECREATION COALITION OF ALBERTA

July 19, 2021

Dear Coal Policy Committee,

The Outdoor Recreation Coalition of Alberta (ORCA) is a voice for recreationists who love to experience the natural beauty of Alberta by the means of their own muscle power. We advocate in support of low impact, non-motorized outdoor activities on public land and work to ensure these activities are recognized, valued, and supported for their social, health and economic benefits.

We are thankful for the opportunity to present to the coal committee. The content of this letter serves as our written submission to the committee.

ORCA is deeply concerned about the direction the Alberta government is headed with regard to coal development. The continued mining and use of thermal coal for energy production runs counter to what is needed to effectively combat climate change. The export of thermal coal will effectively undo the greenhouse gas reductions achieved from Alberta's and Canada's commitment to ban coal-fired electricity generation by 2030. ORCA is also concerned that the expansion of metallurgical-coal mining in Alberta is out of step with the trend towards the de-carbonization of the steel-making industry already underway in other parts of the world. The steel industry is responsible for up to nine percent of the global emissions from the burning of fossil fuels.¹ It is only a matter of time before significant steps, including the development by 2030 of a Hydrogen - DRI (direct reduction of iron) process for steel production, will be taken to bring the industry in line with the goals of the Paris agreement and a net zero world by 2050.²

ORCA believes there is no responsible pathway for development of coal mining in Alberta in any form and is opposed to continued coal exploration and development along Alberta's East Slopes. The concept of a "modern coal policy" being advanced by the government runs counter to what is required to achieve both national and international climate change and biodiversity objectives. To address these critical goals successfully, we need to hold the earth's temperature increase to no more than 1.5 degrees Celsius, and protect 30% of our terrestrial landscapes by 2030. Coal development in this day and age is antithetical to achieving these critical existential goals.

The Government of Alberta should be focused on protecting our natural spaces, ensuring clean drinking water is available for the millions of Canadians who rely on the source waters/headwaters originating in Alberta's eastern slopes, and take appropriate steps to support economic diversification that will support local communities.

¹ <https://thenarwhal.ca/steel-coal-mining-hydrogen/>

² [Hydrogen_vf.pdf \(worldsteel.org\)](https://worldsteel.org/Hydrogen_vf.pdf)

The social, health and economic benefits to Alberta by protecting Alberta's natural landscapes and fostering a sustainable outdoor recreation industry are far greater than any benefit of coal mine development. Long-term economic sustainability and genuine well-being of communities should be the path for Alberta, not short term boom and bust economic ventures that provide no assurance for long-term sustainability and stability for local communities, or for Alberta's economic future.

Outdoor Recreation in Alberta

Every year, millions of Albertans engage in nature-based outdoor recreation. These activities, whether hiking, camping, fishing, skiing, or horseback riding are central to who we are as Albertans and provide important opportunities for us to connect with friends and family in the places that we love.

An Alberta Parks Recreation Survey found that 89% of Albertans believe parks and recreation facilities and services improve quality of life and that "people come to parks to enjoy the great outdoors - to connect with friends, family and the natural world."³

A 2015 report by the Praxis Group assessing the values and attitudes of Albertans towards recreation and the wilderness found that 76% of Albertans engage in outdoor recreation on a regular basis and that the vast majority feel it is important to set aside land for protection from industrial activities.⁴ When survey participants were asked to choose between industrial development and environmental protection the overwhelming majority chose the environment (94% for wildlife and 98% for water).⁵

This study builds on what we have seen in other surveys, that Albertans love to recreate outdoors and almost 90% of them want wilderness protected from development and degradation, even if that protection means limited or no access by humans," says Richard Roberts, President of The Praxis Group. "Albertans' affinity for nature is also seen in the types of recreation they prefer. The vast majority of Albertans practice non-motorized recreation such as hiking, cycling and paddling.⁶

Year over year the demand for outdoor recreation continues to grow and has outpaced government investment in parks and recreation infrastructure like trails and campsites. In the Castle Parks, Designated Camping Sites experienced a 54% increase compared to reported 2019 use, with first use of a campsite such as Lynx Creek showing a 72.2% increase from 2018 to 2020.⁷ Similar trends have been reported through the province including the Bighorn Backcountry west of Rocky Mountain House and Kananaskis Country.

The Covid 19 public health crisis has further underscored the importance of nature and the strong desire for Albertans to engage in outdoor recreation with friends and family to mitigate stress and maintain health. Media reports about the shortage of outdoor equipment sales such as bikes and skis provide other indications about the growing demand for outdoor recreation.

³ <https://albertaparks.ca/albertaparksca/management-land-use/building-the-parks-system/benefits-of-parks/>

⁴ <https://aref.ab.ca/wp-content/uploads/2016/05/CPAWS-Recreation-and-Wilderness-FINAL-REPORT-2015-003.pdf>

⁵ Albertan's Attitudes and Values towards Recreation and Wilderness – Final Report. Canadian Parks and Wilderness Society and the Praxis Group. September 2015.

⁶ Ibid.

⁷ Castle Region Statistics Summary, Castle Provincial and Wildland Parks, Updated March 2021

Value of Outdoor Recreation

The outdoor recreation sector is an important economic driver in Alberta that has been largely overlooked by decision makers focused on extractive resource development. With the right set of policies that support habitat protection and land use planning the outdoor sector could create sustainable, secure long-term economic development on pace with growing recreation demand.

While there is limited economic analysis assessing the total economic benefits of outdoor recreation in Alberta in terms of percentage of GDP, job creation and indirect benefits, the Alberta Government provides economic statistics related to the provincial park system⁸. Each year Alberta's parks bring millions of visitors to rural communities, creating jobs and supporting economic development both directly and indirectly across the province while also providing opportunities to diversify local and regional economies. The Province reports that visitors to Alberta's parks spend \$1.1 billion annually and that this generates a province-wide impact of \$1.2 billion and sustains more than 23,480 person-years of employment.⁹ The Alberta Parks' "Benefits of Parks Report" explicitly acknowledges the strong connection between a healthy environment and economic activity. It says, "Parks protect 'natural assets' that are the cornerstone of Alberta's nature tourism. This strengthens Alberta's position as a nature-based national and international tourist destination."¹⁰ The Alberta Hiking Association estimates that the economic activity associated to the activity of hiking alone contributes more than a billion dollars per year.¹¹

Economic analysis on the value of outdoor recreation in the United States is also useful in understanding the value and potential of outdoor recreation in Alberta. The Bureau of Economic Analysis (BAE) at the U.S. Department of Commerce has found that the outdoor recreation economy accounted for 2.1% or \$459.8 billion of gross domestic product for the entire U.S. economy in 2019.¹² More relevant to the Alberta context, the state level analysis shows the economic benefits of the outdoor recreation industry are the greatest in the "Rocky Mountain States" such as Montana, Wyoming, Utah, and Colorado. For example, the State of Montana enjoys the second highest economic benefit of outdoor recreation representing 4.1% of the GDP and creating 32,000 jobs.¹³ In Colorado, outdoor recreation generated more than \$12 million in revenue and created 150,000 jobs.¹⁴ Given the similarities in geography and population it can be expected the economic benefits of outdoor recreation in Alberta would be similar than the American "Rocky Mountain States."

A 2020, Earth Economic report, Economic Analysis of Outdoor Recreation in Washington State provides similar insights that are relevant to the consideration of outdoor recreation in Alberta.¹⁵ Outdoor recreation in Washington State supports \$26.5 billion in annual expenditures, largely a result of spending by residents and tourists on outdoor recreation trips, including trips to local parks, state parks,

⁸ <https://albertaparks.ca/albertaparksca/management-land-use/building-the-parks-system/benefits-of-parks/>

⁹ <https://albertaparks.ca/albertaparksca/management-land-use/building-the-parks-system/benefits-of-parks/>

¹⁰ <https://albertaparks.ca/albertaparksca/management-land-use/building-the-parks-system/benefits-of-parks/>

¹¹ Alberta Hikers Survey 2020, Prepared by David A. Wasserman, PhD

<http://www.abhiking.ca/pdf/files/c36993768741acf46afa72abe928f910.pdf>

¹² <https://www.bea.gov/data/special-topics/outdoor-recreation>

¹³ <https://www.bea.gov/data/special-topics/outdoor-recreation>

¹⁴

¹⁵ <http://rco.wa.gov/wp-content/uploads/2020/07/EconomicReportOutdoorRecreation2020.pdf?8in4b>

national forests and parks, fishing, and boating, and on outdoor recreation gear. This spending goes on to support 264,000 jobs throughout, meaning that for every \$1 million spent on outdoor recreation, 10 jobs are supported. Outdoor recreation is such a strong job supporter in Washington that 1 in 17 or 6 percent of all jobs in Washington are tied to spending on outdoor recreation. The average labor income associated with these jobs was \$44,000 per year. This totaled to nearly \$12 billion in wages for Washington workers. Additionally, when this estimate is compared to the 200,000 jobs estimated in the 2015 report, the industry has shown strong growth. This places outdoor recreation on par with Washington's aerospace industry in Washington.

Investments into recreation have also shown significant returns and benefits to local communities. In the Methow Valley, Washington, the summer and winter trail system supports the local economy with a \$6 return through salaries for every \$1 invested. In Montana, investment of \$50 million in developing access to fishing access points has resulted in a return on investment of \$900 million/year from anglers into local community economies.¹⁶

A more recent research project completed by Headwaters Economics in Montana (June 2021) clearly states the importance of outdoor recreation to local community economic success by providing jobs, contributing significantly to GDP, and integrating and being part of other industry sectors such as the arts, entertainment, accommodation, retail trade and transportation.¹⁷ More importantly, outdoor recreation has been shown to be a major draw to attract entrepreneurs and new residents, especially those who can work from anywhere in the online universe, as well as retirees who bring their investment income with them.¹⁸

Amenity Migration

Amenity migration occurs when people move to a perceived desirable region or location, usually for non-economic reasons. These include beautiful natural destinations such as parks; an area with significant and desirable recreation and lifestyle opportunities; or a place with cultural significance. In addition to natural beauty and recreation/lifestyle opportunities. Other attributes are also necessary for migration to local communities - these include relatively close access to metropolitan areas, via road and air travel, health care, schools and other community support services.

In the USA, amenity migration in relation to protected areas has been a proven economic benefit to local communities. Headwaters Economics, based in Bozeman, MT, demonstrated that non-metro counties with upward of 30% of their land base protected experienced a 345% increase in economic growth between 1970 and 2010; by comparison, counties that have less than 10% of their lands protected have experienced just 90% growth during the same period. They also found that western non-metro counties have a per capita income that is \$436 higher for every 10,000 acres of protected lands within their boundaries.¹⁹

¹⁶ [The Future of the Outdoor Recreation Economy - Headwaters Economics](#)

¹⁷ [The Future of the Outdoor Recreation Economy - Headwaters Economics](#)

¹⁸ Ibid.

¹⁹ https://headwaterseconomics.org/wp-content/uploads/West_Is_Best_Full_Report.pdf

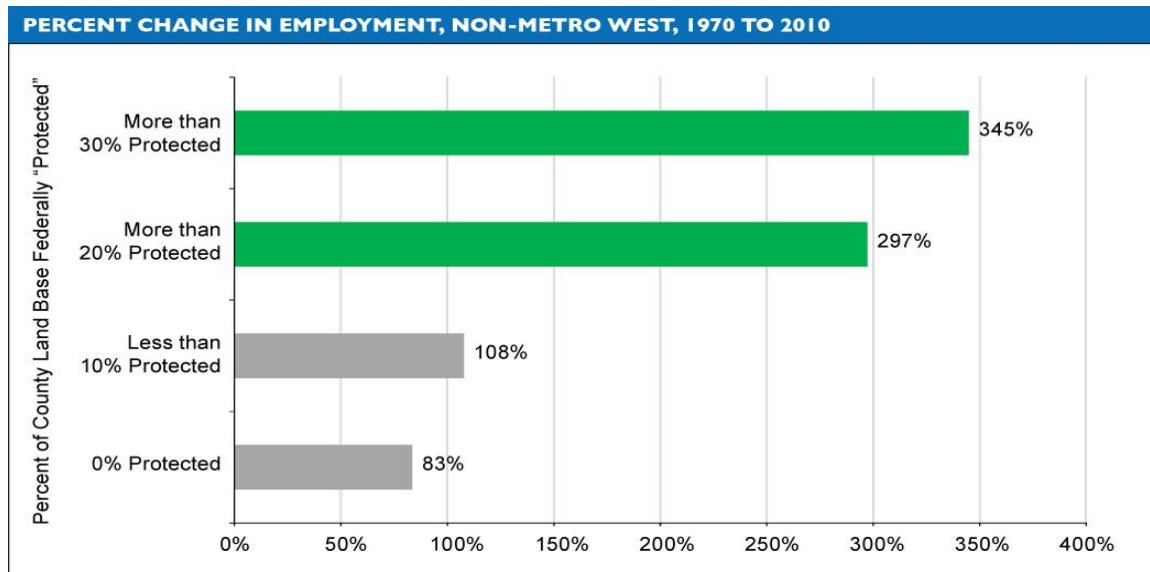


Figure 1: How Public Lands in the West Create Competitive Economic Advantage. Headwaters Economics (2012) p. 19.²⁰

The 2001 report *Economic Values of the U.S. Wilderness System* also summarized the value of protection of natural environments and estimated benefits amounting to U.S. \$3 to 4 billion dollars annually. In addition, the report concluded that protection of wilderness may promote economic development in adjacent communities through attraction of new residents and businesses which value the amenities protected by wilderness, with 45% of current residents and 60% of recent migrants citing wilderness as an important reason for living there.²¹

Amenity migration will become an important economic diversification opportunity for Alberta's Eastern Slopes communities. Outdoor recreation and tourism provide the first introduction to an area, but this, along with important community services such as health care and schools, creates the amenity migration draw, bringing retirees with investment income, business leaders and entrepreneurs who live, work, play and contribute to local communities as well as to the local tax base. Further, outdoor recreation and beautiful natural amenities attract young talent – people with knowledge and skills in manufacturing, finance, tourism and high tech. They come for the scenery, they stay to build community.

For this to happen, intact, ecologically functioning landscapes of great beauty and diversity are the foundation for the spin-off benefits of a vibrant and sustainable outdoor recreation economy. Lost landscapes and contaminated rivers and streams that stem from coal development are not the answer to the long-term sustainability of Alberta's East Slopes communities, or to Alberta's need for a truly diversified future. Putting outdoor recreation into the spotlight as a valuable contributor to community economic development, and the health and well-being of citizens is greatly needed in Alberta.

²⁰ Ibid.

²¹ https://www.researchgate.net/publication/288876400_Economic_values_of_the_US_wilderness_system

Ecosystem Services

A recent national level research project has addressed key ecosystem services in areas that will inform national-scale conservation planning.²² This important work has defined an approach to identify key locations that have the capacity to supply ecosystem services that actually contribute to meeting human demand for these services. This research looked at where three ecosystem services intersect that are important to protected area management in Canada – carbon storage, freshwater and nature-based recreation. The intersection of these three key ecosystem services is limited spatially in Canada, however, when the research team overlaid these three attributes of ecosystem services, the resulting maps are instructive for how we proceed with addressing protection of conservation areas in Alberta, but also how nature-based recreation as a key contributor helps to assess where protection of the landscapes needs to have happen.

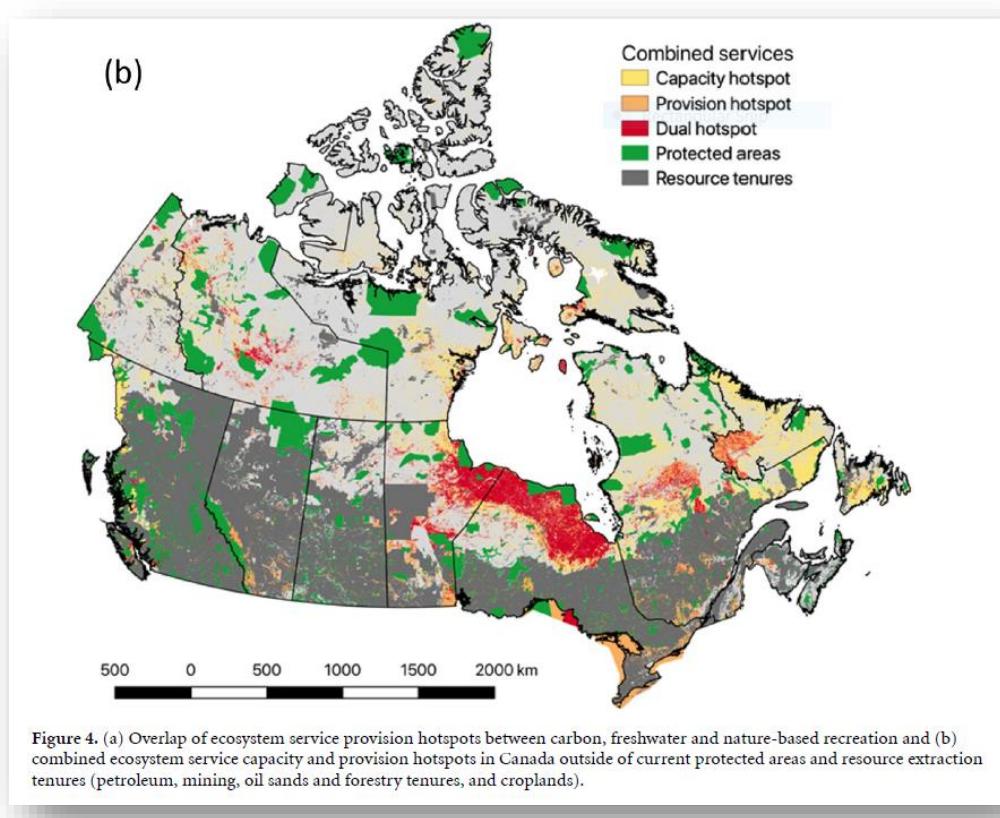
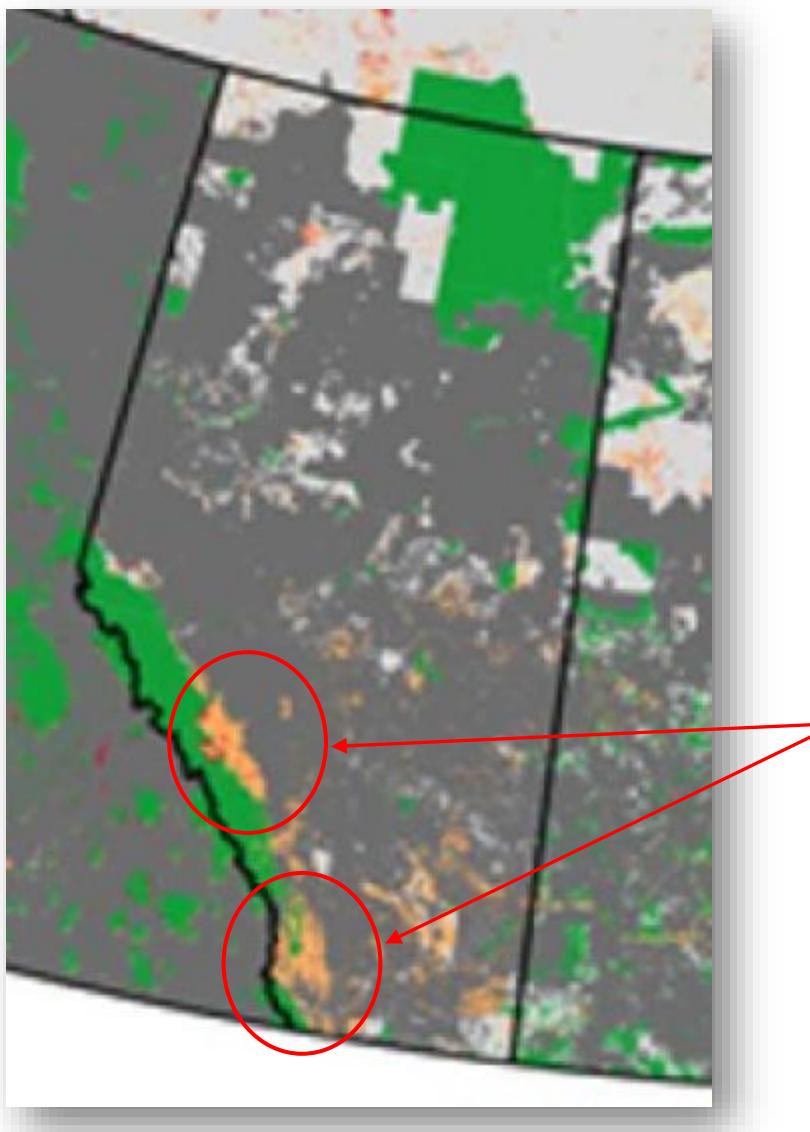


Figure 2: Overlap of ecosystem services provision hotspots in Canada.²³

²² Mitchell, Matthew G.E., et al, 'Identifying Key Ecosystem Service Providing Areas to inform national-scale conservation planning'. Environmental Research – letters. January 5, 2021.

<https://iopscience.iop.org/article/10.1088/1748-9326/abc121/metaa>

²³ Ibid. pg. 8.



Combined ecosystem service capacity and provision hotspots (carbon, freshwater and nature-based recreation) in Alberta

- The Bighorn region west of Rocky Mountain House
- The region of SW Alberta that includes the Livingstone Public Land Use Zone.

Figure 3: Combined ecosystem service capacity and provision hotspots in Alberta outside of current protected areas and resource extraction tenures.²⁴

In a close review of the mapping of combined ecosystem capacity and provision hotspots in Alberta, the key areas that emerge are along Alberta's East Slopes, taking in critical areas west of Rocky Mountain House and in the Nordegg – David Thompson Country corridor and the Livingstone-Porcupine Hills region in SW Alberta. The Nordegg area that has experienced a major increase in outdoor recreation use during the Covid-19 pandemic, and is poised to continue to experience this demand. This region is an important recreation destination for both Edmonton and Calgary populations. SW Alberta has also experienced significant recreation use increases over previous years, and this too is projected to

²⁴ Ibid. pg. 8.

continue. This area is a well-loved destination for Calgarians as well as populations from cities such as Lethbridge, Medicine Hat and communities in southeast British Columbia.

Both regions are also critical source water/headwaters regions that supply freshwater to millions downstream. As the authors of this report also note, ‘...ecosystem services such as freshwater and recreation where human demand and access are key to realizing service benefits’ will ensure that our increasing urban population benefits from and values nature – and this is a major benefit in view of the decline in human connection to nature.²⁵

Recreation Planning and Increased Investment in Parks and Outdoor Recreation Infrastructure

ORCA supports the need for regional and sub-regional land use and recreation management planning in Alberta. Within these planning processes, we fully support the need for scientifically defensible cumulative effects analysis, planning and implementation along Alberta’s East Slopes. Public lands are currently under increasing pressure from intensive resource extraction uses, including forestry, mining and motorized recreation. Alberta’s report card on species at risk, the degradation of East Slopes landscapes, and the multiple threats to critical source water/headwaters regions is indicating a failing grade. Much work on this needs to be done to ensure that the ecological health and benefits of ecosystem services to all of us are protected.

The need for land use and recreation management under the South Saskatchewan Regional Plan resulted in the Livingstone-Porcupine Hills Land Footprint Management Plan (LPH-LFMP) and Recreation Management Plan (LPH-RMP). These plans were completed in 2018 and approved by a majority of Albertans who participated in the public review process. Recreation management planning is greatly needed in order to meet the needs of recreation users, site trails, campgrounds and other recreation infrastructure, promote positive experiences, and to protect watershed biodiversity and other ecological values. The LPH-LFMP and RMP were a good first step to address *some* cumulative effects management needs, but have now run into a major issue with coal development.

In the LPH-LFMP, threshold metrics were set for the extent of linear disturbance for both public access as well as for restricted industrial access. During the creation of these plans, coal development was not considered as a potential use in the Livingstone PLUZ. The rescinding of the 1976 Coal Policy in May 2020 and subsequent approvals for coal exploration has resulted in an excess of coal development linear disturbance in the Livingstone Public Land Use Zone. While the reinstatement of the 1976 Coal Policy and moratorium on further coal exploration is now in place, the current coal exploration impacts are most likely *in excess* of the legally set limits on linear disturbance under the SSRP’s Land Footprint Management Plan. This potential exceedance of linear density as per the LPH-LFMP thresholds should be reviewed and assessed by an independent third party, and a report on this provided to the Coal Policy Committee.

²⁵ Ibid. pg. 9.

The impacts of coal exploration and the proposed coal mine footprint on recreation access, use and enjoyment of recreationists in SW Alberta is significant. The following map of the Livingstone PLUZ indicates the compromise of quality and/or loss of camping opportunities, trails, and staging areas under the proposed mining footprint. The first two maps are focused on SW Alberta, followed by a map showing the proposed coal footprint west of Nordeg. Potential and current coal Impacts on recreation access and opportunities in the Bighorn-West Country, Hinton and Grande Cache areas all amount to similar loss of outdoor recreation destinations and ecosystem services that are enjoyed and needed for the health and well-being of millions of Albertans and visitors.

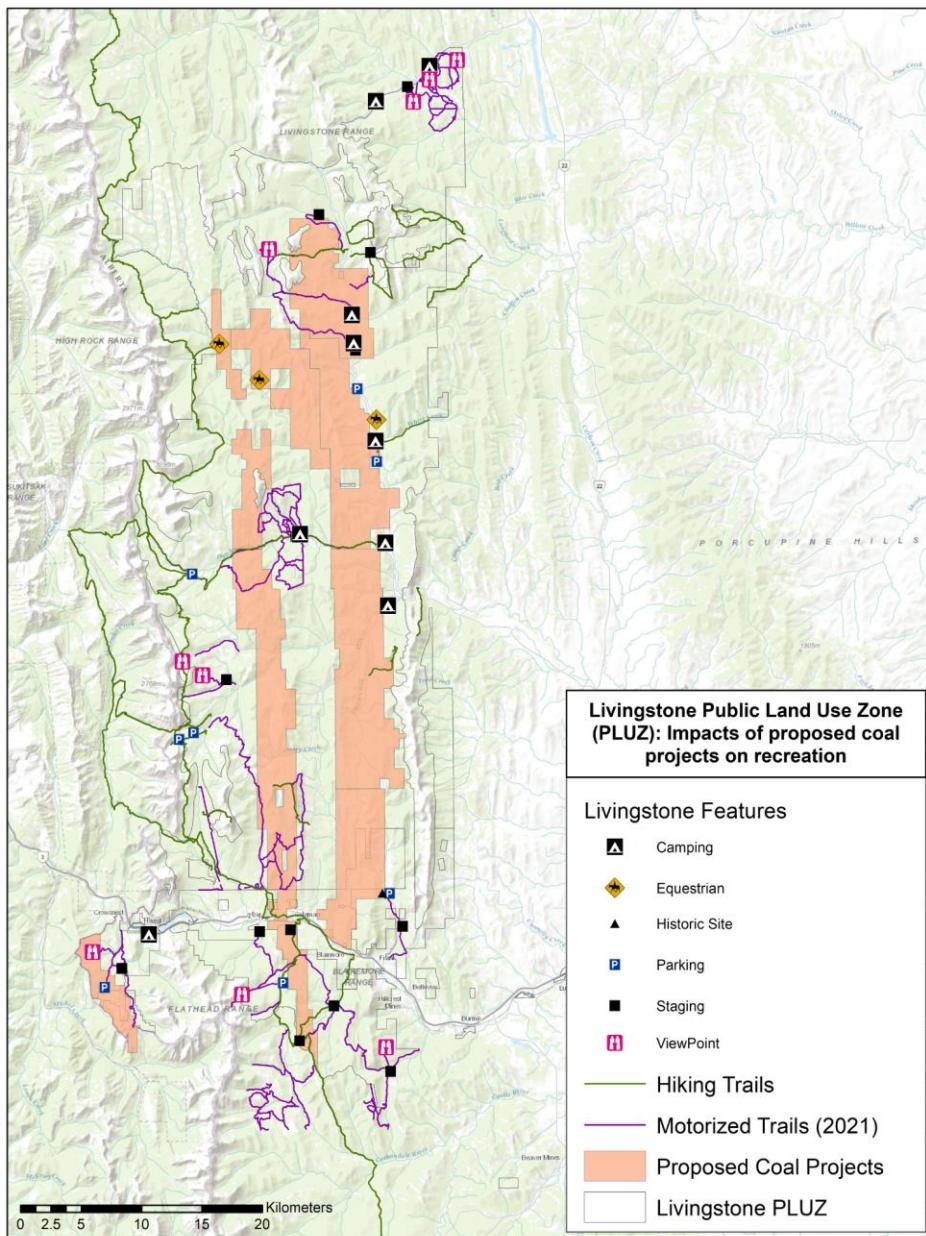


Figure 4: The Livingstone Public Land Use Zone showing outdoor recreation amenities - camping, equestrian and motorized and non-motorized trails in juxtaposition with the proposed coal project footprint. (Not all non-motorized trails are noted on this map - see Figure 5)

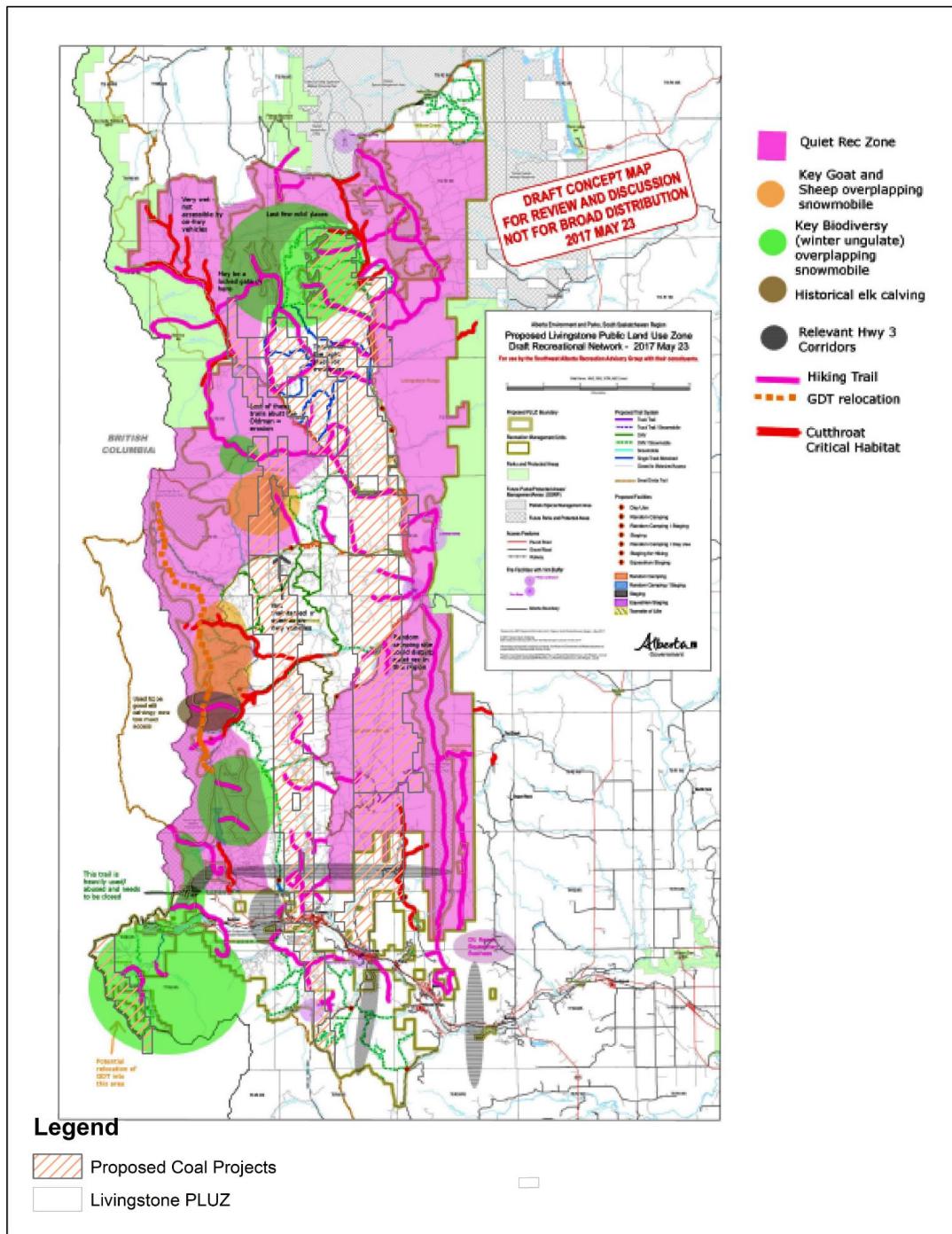


Figure 5: Livingstone Public Land Use Zone with non-motorized trails overlay on proposed mine footprint. This is a non-motorized ('Quiet Recreation') concept map provided to the Gov't of Alberta during the development of the Livingstone-Porcupine Hills Recreation Management Plan. This trail network and proposed non-motorized (Quiet Recreation) zone map was developed by local people who know the area and regularly access it for non-motorized outdoor recreation.

The following map and photographs show the extent of coal leases and coal lease applications in the region west of Rocky Mountain House. As is the case in the Livingstone region, the area is a major outdoor recreation destination for populations in both Edmonton and Calgary. Significant recreation access, trails and other amenities, the health and integrity of the landscape, and long-term sustainable economic opportunities as an outdoor recreation destination would be compromised or lost to coal development.

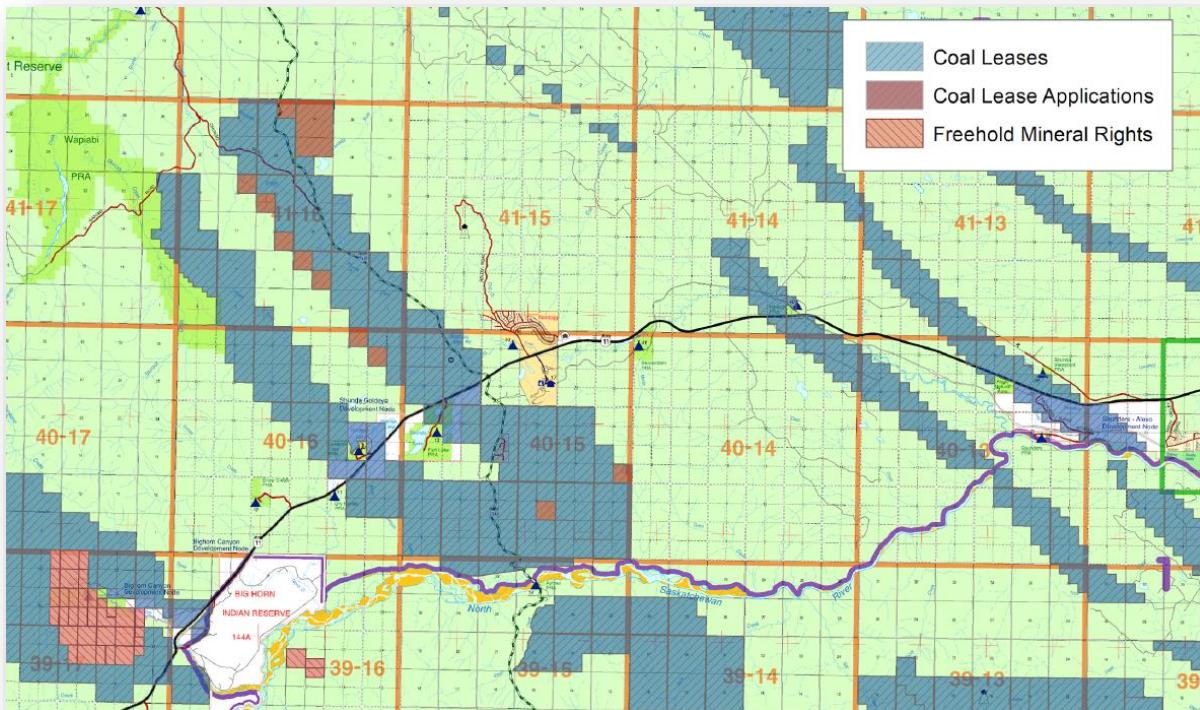


Figure 6: Coal Leases, Applications ad Freehold Mineral Rights areas in high value recreation areas in the Nordegg – David Thompson Country area.



Figure 7: Extent of logging roads and potential coal exploration access – Nordegg west.



Figure 8: Logging road and potential coal exploration access road west of Nordegg has compromised an interpretive hiking trail used by local eco-tourism operator.

The payoffs from coal - not a good return for Alberta

The history of coal mining in Alberta has been fraught with boom and bust cyclical swings that have often left workers and communities in a state of anxiety over the on again/off again nature of coal mining revenues. Weathering the inevitable downturns is not easy, and leads to disruption of families and the ability of communities to provide essential services with reasonable assurance of a sustainable tax base. By its very nature, mining of any sort is not a renewable enterprise. Jobs in the coal sector

have gone from a peak in 1998 with 2,985 jobs, dropping to 925 in 2004, followed by a short lived increase in 2013 to 2605 jobs, and then back to around 1300-1700 jobs after 2004.²⁶

Royalties from metallurgical and thermal coal production in Alberta have also returned little to the Alberta taxpayer. With just 1% of mine mouth revenue (MMR) in the first tier or royalty payments, and 1% of MMR plus 13% of net revenue in the second tier, the return to Albertans has been shown by the Alberta Wilderness Association to be significantly less than the tourism levy in 2019-20. In this year, an estimated \$12.8 million was provided from coal royalties, while the tourism levy provided an estimated \$89 million.²⁷

One has to ask, if we increased our focus on outdoor recreation, tourism and eco-tourism, even with just a tourism levy we would see a greater contribution to the provincial coffers than coal royalties, and not ruin the heart of the East Slopes with the landscape destruction that comes from coal mining.

Coal development also brings major liabilities such as selenium pollution and reclamation failures. The Obed Mt. Mine tailing pond failure is one such debacle, with little to no recompense for a major pollution spill into the Athabasca River. The threat to critical habitat for species at risk is another major issue – we should be in full reclamation and restoration mode with westslope cutthroat trout and bull trout, not contemplating decimation of remaining population with coal development in the watersheds of these species. An then, there is the total imposition of coal on a landscape that will not return to recovered state for centuries – even the best reclamation work is not able to bring previous biological diversity back to mine sites.

We also need to address the creation of fear and fatalism when resource extraction economies stagnate and the decline in Alberta. In his book, ‘Lost Landscapes and Failed Economies’, Dr. Thomas Power provides a well-researched review of how resource extraction industries that are on the decline often employ scare tactics around economic insecurity, and that protection of the environment and alternative economies will not provide the same income and economic viability that resource extraction does.²⁸ Dr. Power provides case studies and analysis that clearly show that this is not the case, and that communities rebound from resource extraction downturns, and that protection of intact landscapes is a critical part of a community’s economic diversification transformation. He makes a solid case that essential natural assets should not to be sacrificed for short-term industrial ventures that are ultimately unsustainable.

The long term contributions of outdoor recreation, tourism and eco-tourism in providing long-term sustainable incomes and a stable tax base for local communities is greater than and the boom and bust cycles and inevitable closures that come with coal development. In consideration of the research on the future of an Outdoor Recreation economy in the western USA, an important way forward for Alberta is not with coal development, but with an economic diversification strategy that is premised on excellent land-use and recreation management, policy and regulatory support for outdoor recreation, tourism,

²⁶ [AWA Appears Before Alberta Coal Policy Committee - Alberta Wilderness Association](#)

²⁷ Ibid.

²⁸ Power, Thomas Michael. ‘Lost Landscapes And Failed Economies – The Search for Value of Place’. 1996. Island Press.

eco-tourism, and management strategies for amenity migration and economic diversification outcomes.²⁹

ORCA's statement on Coal

ORCA is committed to providing a voice for non-motorized recreationists, and for contributions to health, well-being and economic diversification that this sector provides to Albertans and Alberta.

ORCA respectfully submits that to fully realize the need for healthy intact landscapes for the health and well-being of Albertans, and the promise of an outdoor recreation economy and the significant contributions this sector provides, coal mining along Alberta's East Slopes should not be permitted.

ORCA supports increased investment in parks and protected areas, in public recreation areas, and other outdoor recreation amenities that will help to provide the necessary foundations for a transition to a more sustainable and diversified economy.

Outdoor recreation, tourism, eco-tourism and amenity migration bring significant lifestyle and economic benefits to local communities. While the transition to support an outdoor recreation economy in local communities requires foresight and good management, the long term benefits result in more vibrant communities, a diversity of businesses, increases in jobs, increases in GDP, and integration into other sectors such as arts and entertainment, retail trade and transportation.

We sincerely thank the Coal Policy Committee for the opportunity to provide this information and present our views on the proposed new Coal Policy for Alberta.

Sincerely,



Connie Simmons, PhD
Chair – Outdoor Recreation Coalition of Alberta
Chair@orca-alberta.ca
www.orca-alberta.ca

²⁹ [The Future of the Outdoor Recreation Economy - Headwaters Economics](#)